

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

## **DISMISSAL OF INDICTMENT**

Pursuant to Fed. R. Crim. P. 48(a), the United States of America hereby dismisses the Indictment in this matter charging Gang Chen with wire fraud, in violation of 18 U.S.C. § 1343, failure to report a report of foreign bank and financial account, in violation of 31 U.S.C. §§ 5314 and 5322, and making a false statement, in violation of 18 U.S.C. § 1001. As a result of our continued investigation, the government obtained additional information bearing on the materiality of the defendant's alleged omissions. Having assessed the evidence as a whole in light of that information, the government can no longer meet its burden of proof at trial.

Dismissal of the Indictment is therefore in the interests of justice.

Respectfully submitted,

RACHAEL S. ROLLINS  
United States Attorney

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B. Stephanie Siegmann

Jason Casey

Timothy Kistner

Assistant U.S. Attorney

David C. Aaron, Trial Attorney

David C. Aaron, Trial Atto  
U.S. Department of Justice

U.S. Department of Justice  
National Security Division

## National Security DIVISION Counterintelligence & Espionage

## Counterintelligence & Export Control Section

Dated: January 20, 2022

Leave to File Granted:

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Patti B. Saris, Judge  
United States District Court